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Department of Energy

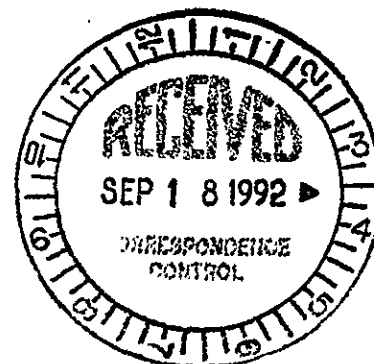
Richland Field Office

P.O. Box 550

Richland, Washington 99352

92-RPB-179

JUL 28 1992



Mr. Dean B. Ingemansen
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Dear Mr. Ingemansen:

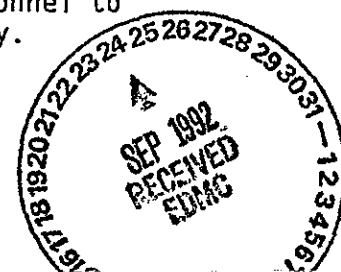
LEGAL DESCRIPTION AT HANFORD FEDERAL FACILITY

In response to your letter of July 15, 1992, to Mr. Robert Carosino please find enclosed a revised legal description for the Hanford Facility. Our review indicated that the Legal Description enclosed as Attachment "N" to the DOE Richland Field Office (RL) comments of March 16, 1992, of the draft initial Hanford Facility permit was essentially correct. However, the description of the land leased to the Washington Public Power Supply System (Supply System) was modified to properly reflect the additional lands leased to the Supply System for commercial plants 1 and 4. In addition, pursuant to your request, the Bonneville Power Administration (BPA) Ashe Substation site, operated under a use permit from RL, is no longer excluded from the facility description.

We have reviewed the topographical map (Drawing H-6-958) provided to the U.S. Environmental Protection Agency (EPA) as Appendix 2A of the Hanford Facility Dangerous Waste Permit Application and have determined that it appropriately reflects the 640-acre site owned by the State of Washington, the 1000-acre site leased to the State of Washington, and the lands leased to the Supply System for WNP plants 1, 2, and 4. The land leased to the Supply System for plants 1, 2, and 4 is provided under two separate lease agreements and is delineated as exclusions E and F in our facility definition. However, the leased area for plants 1, 2, and 4 form a contiguous block of land and, therefore, are shown as a single block on the enclosed topographical map.

Also enclosed with this letter are additional larger scale maps of the land leased to the Supply System for the Hanford Generating Plant (HGP) and the BPA's independently owned Midway Site. The BPA's independently owned Midway Site includes the substation and community area. It also includes some disposal areas. However, the access road from Highway 240 to the Midway Site forms the property boundary and any landfills north of the access road would be on RL property.

I understand that the recent site inspection of the Supply System HGP and WNP sites 1, 2, and 4 were successfully conducted and that the parties were able to determine whether solid waste management units were within or outside of the leased areas. RL program offices will continue to provide personnel to help make such determination if other site inspections are necessary.



1111 28 1992

Mr. D. B. Ingemansen
92-RPB-179

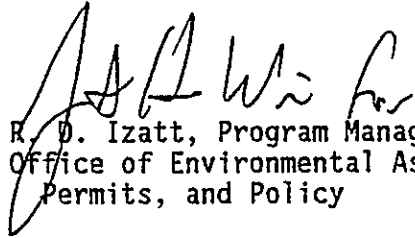
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While we understand that you consider use permit areas such as the Ashe Substation to be part of the Hanford Facility under the Hanford Federal Facility Agreement and Consent Order for corrective action, it should be understood that the activities conducted by BPA at that site are conducted independently of RL. BPA is the operator of that facility and certain other substation facilities. BPA would be independently responsible for conducting its activities in compliance with environmental laws and regulations, at such sites including obtaining a Resource Conservation and Recovery Act permit for its activities if regulated Treatment, Storage or Disposal (TSD) activities were conducted by BPA.

As you know the actual TSD activities at Hanford involve a much smaller area than the contiguous Hanford Facility land area. We would appreciate your views on whether it would be appropriate to further limit the area encompassed by the legal description. For example, no TSD activities are conducted on the Arid Lands Ecology Preserve which encompasses that portion of the site on the side west of Highway 240. Similarly, TSD units are not located in most other areas of the site outside of operational areas. This land and other portions not actively used by RL may be transferred to other parties in the future and it is not clear how the inclusion of such land in the legal description would affect this matter. EPA's experience in dealing with such issues at other sites could be extremely useful and we solicit your input.

If you desire further information, please contact me or Mr. R. M. Carosino on (509) 376-4264 or Mr. C. E. Clark of my staff on (509) 376-9333.

Sincerely


R. D. Izatt, Program Manager
Office of Environmental Assurance,
Permits, and Policy

RPB:RNK

Enclosures

cc:

C. Ahlstrom, EPA
P. Day, EPA
D. Duncan, EPA
J. Schuster, PRC w/encl.
D. Jansen, Ecology
T. Michelena, Ecology
J. Witczak, Ecology
C. Geier, WHC
P. Mackey, WHC
S. Price, WHC

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author

Addressee

Correspondence No.

R. D. Izatt, RL

D. B. Ingemansen, EPA

Incoming: 9205987

Subject: LEGAL DESCRIPTION AT HANFORD FEDERAL FACILITY

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	
		S. L. Bradley	B3-06	
		R. C. Brunke	H4-57	
		R. H. Engelmann	H4-57	
		G. D. Forehand	B2-35	
		C. J. Geier	B2-19	
		J. I. Giomi	H4-18	
		R. E. Lerch	B2-35	
		P. J. Mackey	B3-15	
		H. E. McGuire, (Level 1)	B3-63	
		R. W. Oldham	H4-57	
		S. M. Price	H4-57	
		F. A. Ruck	H4-57	
		R. G. Slocum	B5-21	
		T. B. Veneziano	B2-35	
		E. P. Vodney	B3-50	
		EDMC	H4-22	
		Environmental Tracking	H4-18	
		R. D. Wojtasek (Assignee)	L4-92	
		G. W. Jackson	B2-35	



HANFORD FACILITY LEGAL DESCRIPTION

The Hanford Site being a tract of land located in Benton County, WA, the aforesaid tract being more particularly described as follows:

Commencing at the point of intersection of the E.-W. centerline of sec. 14, T.10N., R.28E. Willamette Meridian, with the western navigation line of the Columbia River;

Thence northerly 200 feet along said line of navigation to the TRUE POINT OF BEGINNING;

Thence W. to a point on the W. right-of-way line of George Washington Way, which line is the boundary of the City of Richland;

Thence southerly 100 feet or less, along said right-of-way line of George Washington Way to a point on the N. right-of-way line of Horn Rapids Road, an unplatted road;

Thence W. along the N. right-of-way line of Horn Rapids Road approximately 1/2 mile to the E. right-of-way line of Stevens Drive, an unplatted road;

Thence S. along said E. right-of-way line to a point on the N. right-of-way line of Spengler Street, a platted street;

Thence W. 145 feet to the W. right-of-way line of Stevens Drive;

Thence S. to a point 30 feet N. of the S. line of sec. 27, T.10N., R.28 E.W.M.;

Thence W. along a line 30 feet N. of, and parallel with, the S. line of sec. 27 to the E. line of the S.W. 1/4 of the S.E. 1/4 of said section;

Thence N. along the E. line of the S.W. 1/4 of the S.E. 1/4 of sec. 27 to the S.E. corner of the N.W. 1/4 of the S.E. 1/4 of said sec. 27;

Thence W. along the S. line of the N.W. 1/4 of the S.E. 1/4 to the W. line of the E. 1/2 of sec. 27;

Thence N. along the W. line of the E. 1/2 of sec. 27, and of the E. 1/2 of sec. 22 and the E. 1/2 of sec. 14 to the N. right-of-way line of Horn Rapids Road;

Thence westerly and northwesterly along the N. right-of-way line of Horn Rapids Road 26,000 feet more or less to the line's intersection with the N. right-of-way line of State Highway 240, in the N.E. 1/4 of sec. 11, T.10N., R.27E.W.M.;

Thence northwesterly along said N. right-of-way line of the highway, 75 feet N. of and parallel with the centerline of said highway to a point in sec. 3, T.10N., R.27E.W.M., which point is on the eastward extension of the N. right-of-way line of a county road from Horn Rapids to Benton City;

Thence along the northerly and westerly right-of-way line of said road, 75 feet northerly and westerly of, and parallel with, the center line of said road to a point on the E. line of sec. 8, T.10N., R.27E.W.M.;

Thence N. to the E. quarter corner of said section;

Thence W. to the S.W. corner of the E. 1/2 of the N.E. 1/4 of sec. 12, T.10N., R.26E.W.M.;

Thence N. to the N. line of said sec. 12;

Thence W. to the N.E. corner of the N.W. 1/4 of the N.W. 1/4 of the N.W. 1/4 of sec. 11, T.10N., R.26E.W.M.;

Thence S. 660 feet;

Thence W. 660 feet to the E. line of sec. 10, T.10N., R.26E.W.M.;

Thence S. to the S.E. quarter corner of said sec. 10;

Thence W. along the E.-W. centerline of sec. 10 to the W. line of said section;

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Thence N. along the W. section line to the S.E. corner of sec. 4, T.10N., R.26E.W.M.;

Thence W. along the S. line of sec. 4 and sec. 5 to the S.W. corner of the S.E. 1/4 of the S.E. 1/4 of sec. 5;

Thence N. to the S.E. corner of the N.W. 1/4 of the S.E. 1/4 of sec. 5;

Thence W. along the S. line of the N.W. 1/4 of the S.E. 1/4 to the S.W. corner of the N.W. 1/4 of the S.E. 1/4;

Thence N. to the S.E. corner of the N. 1/2 of the N.W. 1/4;

Thence W. along the S. line of the N. 1/2 of the N.W. 1/4 to the W. line of sec. 5;

Thence N. to the S.E. corner of sec. 31, T.11N., R.26E.W.M.;

Thence W. along the S. line of the E. 1/2 of the S.E. 1/4 of sec. 31 to the E. line of said E. 1/2 of the S.E. 1/4 of sec. 31;

Thence N. along the W. line of the E. 1/2 of the S.E. 1/4 to the S.E. corner of the S.W. 1/4 of the N.E. 1/4 of sec. 31;

Thence W. along the S. line of the S.W. 1/4 of the N.E. 1/4 to the S.W. corner of the S.W. 1/4 of the N.E. 1/4;

Thence N. along the W. line of the S.W. 1/4 of the N.E. 1/4 to the S.E. corner of the N. 1/2 of the N.W. 1/4 of said sec. 31;

Thence W. along the S. line of the N. 1/2 of the N.W. 1/4 to the W. line of said sec. 31;

Thence N. along the W. line of sec. 31 to the S.E. corner of sec. 25, T.11N., R.25E.W.M.;

Thence W. along the S. line of sec. 25 to the S.W. corner of the S.E. 1/4 of the S.E. 1/4 of said sec. 25;

Thence N. along the W. line of the S.E. 1/4 of the S.E. 1/4 to the S.E. corner of the N.W. 1/4 of the S.E. 1/4;

Thence W. along the S. line of the N.W. 1/4 of the S.E. 1/4 to the S.W. corner of the N.W. 1/4 of the S.E. 1/4;

Thence N. along the W. line of the N.W. 1/4 of the S.E. 1/4 to the S.E. corner of the N.W. 1/4 of sec. 25;

Thence W. along the S. line of the N.W. 1/4 of sec. 25 to the W. line of sec. 25;

Thence N. along the W. line of sec. 25 and the W. line of sec. 24 to the N. line of the S. 1/2 of the S. 1/2 of sec. 23;

Thence W. along the N. line of the S. 1/2 of the S. 1/2 of sec. 23 and the N. line of the S. 1/2 of the S. 1/2 of sec. 22 and the N. line of the S. 1/2 of the S. 1/2 of sec. 21 to the E. line of sec. 20;

Thence S. to the S.E. corner of sec. 20;

Thence W. along the S. line of sec. 20 and the S. line of sec. 19 to the S.E. corner of the S.W. 1/4 of the S.W. 1/4 of sec. 19;

Thence N. to the N.E. corner of the S.W. 1/4 of the S.W. 1/4 of sec. 19;

Thence W. to the W. line of sec. 19, all being in T.11N., R.25E.W.M.;

Thence continuing W. to the S.W. corner of the N.E. 1/4 of the S.E. 1/4 of sec. 24, T.11N., R.24E.W.M.;

Thence N. to the N.W. corner of said N.E. 1/4 of the S.E. 1/4 of sec. 24;

Thence W. to the S.W. corner of the S.E. 1/4 of the N.W. 1/4 of sec. 24;

Thence N. to the N.W. corner of said S.E. 1/4 of the N.W. 1/4 of sec. 24;

Thence W. to the W. line of sec. 24;

Thence N. to the N.W. corner of sec. 24;

Thence W. to the S.E. quarter corner of sec. 14;

Thence N. to the N.W. quarter corner of sec. 14;

Thence W. along the N. line of sec. 14 to the N.W. corner of sec. 14;

Thence N. along the W. line of sec. 11 and sec. 2 to the N.W. corner of sec. 2, all being in T.11N., R.24E.W.M., and continuing N. along the W. lines of secs., 35, 26, 23, 14, 11, and 2, all being in T.12N., R.24E.W.M.;

Thence continuing N. along the W. lines of secs. 35 and 26 in T.13N., R.24E.W.M., to the N.W. corner of sec. 26;

Thence W. along the S. line of sec. 22 to the S.E. quarter corner of sec. 22;

Thence N. along the N.-S. centerline of sec. 22 to the N.E. quarter corner of sec. 22;

Thence W. along the S. line of sec. 15 to the S.W. corner of sec. 15;

Thence N. along the W. line of sec. 15 to the S.W. corner of the N. 1/2 of the N.W. 1/4 of sec. 15;

Thence E. along the S. line of the N. 1/2 of the N.W. 1/4 of sec. 15 to the S.W. corner of the N.W. 1/4 of the N.E. 1/4 of sec. 15;

Thence N. along the W. line of the S.W. 1/4 of the N.E. 1/4 of sec. 15 and continuing N. along the centerline of sec. 10 to the W. navigation line of the Columbia River, following said navigation line easterly, northerly, and southerly to a point directly W. of the S. line of Tract 4 of Ringold Tracts according to the plat filed in the records of Franklin County.

Thence southerly along the said W. line of navigation to the TRUE POINT OF BEGINNING.

EXCEPTING FROM THE ABOVE-DESCRIBED LAND THE FOLLOWING PARCELS, EXCLUDING that portion of the Hanford Railroad and any Hanford Site access roads which may traverse these parcels.:

PARCEL A) The N. 1/2 of the N.W. 1/4, and that portion of the N.W. 1/4 of the N.E. 1/4 in sec. 14, T.13N., R.24E.W.M. in the ownership and jurisdiction of the BONNEVILLE POWER ADMINISTRATION.

PARCEL B) Sec. 1, T.11N., R.26E.W.M. in the ownership under quitclaim deed, of the STATE OF WASHINGTON.

PARCEL C) A tract of land leased to the STATE OF WASHINGTON lying in sections 7, 8, and 9, T.12N., R.26E.W.M., containing 1,000 acres more or less, more particularly described as follows: That part of the S. 1/2 of said sec. 7 bounded on the W. and N. by the following described line: BEGINNING at a point on the S. line of said sec. 7, which point is S. 88° 44' 47" W. 4,515.30 feet from the S.E. corner of the sec., and at coordinates N. 438,868.46 and E. 2,222,800.00 on the Washington State Grid System, South Zone; thence N. 1,781.54 feet; thence E. 2,200.00 feet; thence N. 907.19 feet more or less to the N. line of said S. 1/2 of the sec.; thence N. 88° 38' 43" E. along said line 2,275.48 feet more or less to the E. quarter corner of said sec. 7. The S. 1/2 of sec. 8. The S. 1/2, and the S. 1/2 of the N. 1/2 of sec. 9, EXCEPT that portion lying easterly of the following described line: BEGINNING at a point on the E. line of said sec. 9, which point is N. 0° 53' 09" W. 3,071.71 feet from the S.E. corner of the sec., and at coordinates N. 442,268.92 and E. 2,237,790.19 on the Washington State Grid System, South Zone; thence northwesterly along a 1,055.37 foot radius curve to the right an arc distance of 1,064.64 feet (the chord of said arc bears N. 30° 21' 08" W. 1,020.05 feet) to a point on the N. line of the S. 1/2 of the N. 1/2 of said sec. 9, said point being at coordinates N. 443,149.16 and E. 2,237,274.74 on the Washington State Grid System, South Zone.

Three tracts of land leased to the WASHINGTON PUBLIC POWER SUPPLY SYSTEM more particularly described as follows:

PARCEL D) a tract of land (for the Hanford Generating Plant), commencing at the S.E. corner of sec. 28, T.14N., R.26E.W.M., said point having Washington State Coordinates, South Zone, of N. 486,994.01, and E. 2,236,672.11; thence N. $72^{\circ} 02' 15''$ W. 3,483.15 feet, thence N. $67^{\circ} 11' 41''$ W. 1,810 feet more or less to a point on the line of ordinary high water on the right bank of the Columbia River, which point is the TRUE POINT OF BEGINNING: thence S. $67^{\circ} 11' 41''$ E. 1,810 feet more or less to a point, having Washington State Coordinates, South Zone, of N. 488,068.19 and E. 2,233,358.73, thence N. $22^{\circ} 48' 19''$ E. a distance of 1,595 feet to a point, having Washington State Coordinates, South Zone, of N. 489,538.48 and E. 2,233,976.96, thence N. $67^{\circ} 11' 41''$ W. 1,108 feet more or less to a point on the line of ordinary high water on the right bank of the Columbia River, thence southwesterly along the said line of ordinary high water to the TRUE POINT OF BEGINNING, containing 53.42 acres more or less; THIS PARCEL AMENDED BY DELETING THE FOLLOWING: Beginning at the S.E. corner of the leased parcel, which point is at coordinates N. 488,068.19 and E. 2,233,358.73 on the Washington State Coordinate, South Zone; thence N. $22^{\circ} 48' 19''$ E. 1,060 feet; thence N. $67^{\circ} 11' 41''$ W. 200 feet; thence S. $22^{\circ} 48' 19''$ W. 1,060 feet; thence S. $67^{\circ} 11' 41''$ E. 200 feet to the point of beginning; containing 4.85 acres, more or less;

PARCEL E) A tract of land (for WNP Site 2), beginning at the S.W. corner of sec. 11, T.11N., R.28E.W.M., said corner having Washington State coordinates, South Zone, of N. 408,335.30 and E. 2,307,653.50, thence N. $0^{\circ} 41' 08''$ E. 8,065.28 feet to the TRUE POINT OF BEGINNING; thence W. 11,153.57 feet; thence S. $01^{\circ} 01' 23''$ E. 3,000.48 feet; thence S. $88^{\circ} 53' 54''$ W. 5,200.96 feet; thence N. $0^{\circ} 31' 41''$ W. 3,690.15 feet; thence E. 1,430.00 feet; thence N. 1,865.69 feet; thence N. $87^{\circ} 46' 08''$ E. 3,703.83 feet; thence S. $01^{\circ} 01' 23''$ E. 1,600.25 feet; thence E. 11,189.29 feet; thence N. $01^{\circ} 01' 23''$ E. 1,800.29 feet; thence N. $89^{\circ} 07' 55''$ E. 3,300.38 feet to the line of Navigation of the W. bank of the Columbia River, thence southerly along said line of Navigation to a point that bears N. $89^{\circ} 15' 21''$ E. from the TRUE POINT OF BEGINNING; thence S. $89^{\circ} 15' 21''$ W. 3,850.32 feet more or less to the TRUE POINT OF BEGINNING.

PARCEL F) A tract of land (for WNP Sites 1 and 4) lying in Section 4 of Township 11 North, Range 28 East, Willamette Meridian, described as follows:

Beginning at the Southwest corner of Section 11, Township 11 North, Range 28 East, W.M., (said corner being located by reference to the Washington State Coordinate System South Zone at coordinates North 408,335.30 and East 2,307,653.50) thence North $65^{\circ}-17'-03''$ West 12113.14 feet to the TRUE POINT OF BEGINNING (said point being located by reference to the Washington State Coordinate System South Zone at coordinates North 413,400.00 and East 2,296,650.00); thence North $01^{\circ}-01'-23''$ West 3000.48 feet to a point; thence East 5280.00 feet to a point; thence South $01^{\circ}-01'-23''$ East 3000.48 feet to a

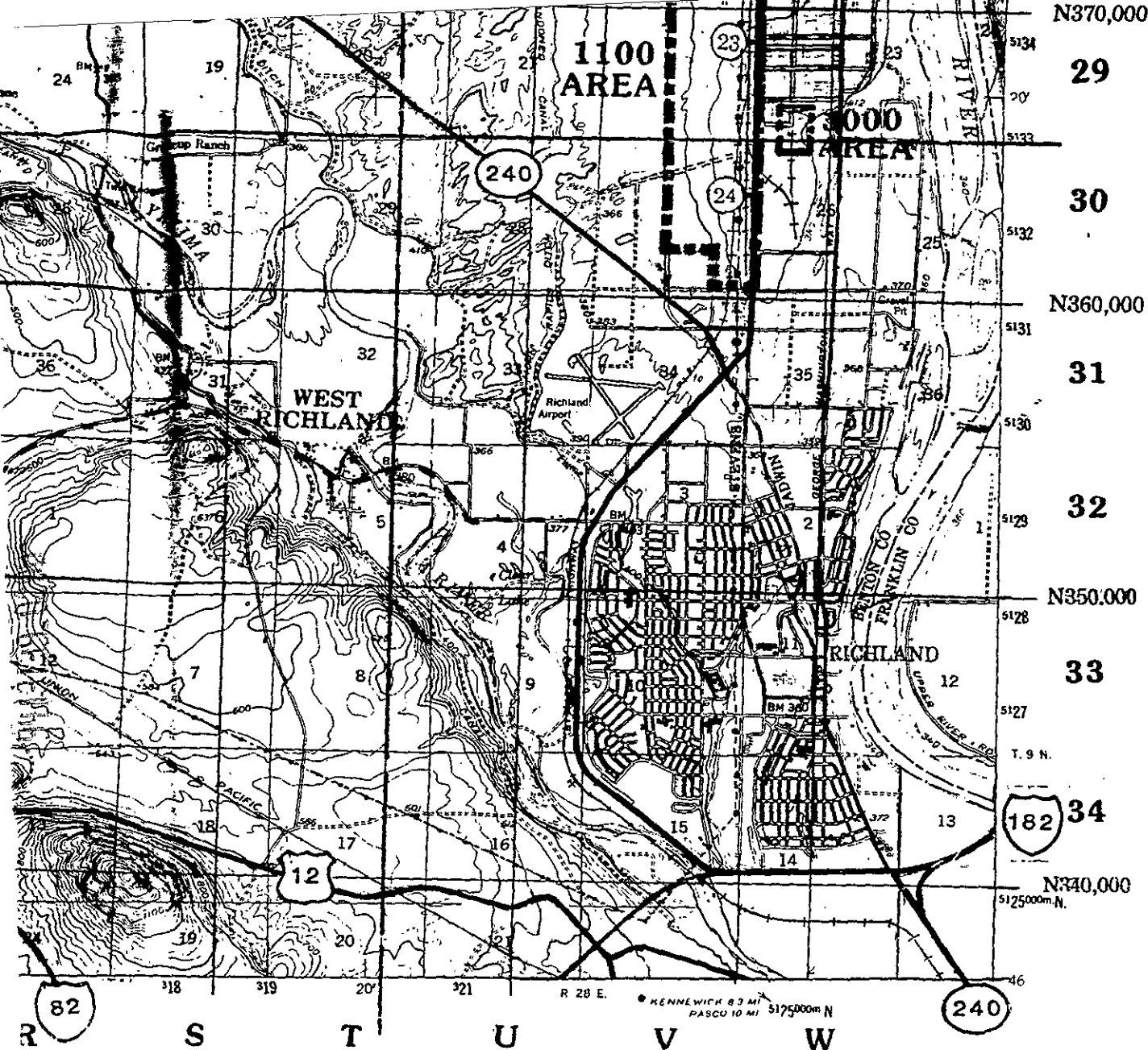
point; thence West 5280.00 feet more or less to the TRUE POINT OF BEGINNING, containing 363.69 acres more or less; and

A parcel of land lying in Sections 3 and 4 of Township 11 North, Range 28 East, and Sections 33 and 34 of Township 12 North, Range 28 East, Willamette Meridian, described as follows:

Beginning at the Southwest corner of Section 11, Township 11 North, Range 28 East, W.M., (said corner being located by reference to the Washington State Coordinate System South Zone at coordinates North 408,335.30 and East 2,307,653.50) thence North 50°-42'-00" West 14,311.63 feet to the TRUE POINT OF BEGINNING (said point being located by reference to the Washington State Coordinate System South Zone at coordinates North 417,400.00 and East 2,296,578.57); thence North 01°-01'-23" West 3000.48 feet to a point; thence East 5,280.00 feet to a point; thence South 01°-01'-23" East 1200.19 feet to a point; thence East 5,973.57 feet to a point; thence South 1°-01'-23" West 1800.29 feet to a point; thence West 11,189.29 feet more or less to the TRUE POINT OF BEGINNING, containing 609.15 acres more or less.

For purposes of application of Part IV Corrective Action of this permit only, the facility also includes PARCELS C, D, E, and F of the lands identified as Excepted from the ABOVE-DESCRIBED LAND, in the foregoing legal description.

91339.000



DRAWING APPROVALS		DATE
APPD FOR QUALITY ASSURANCE		
APPD	<i>[Signature]</i>	3/89
APPD	<i>[Signature]</i>	13 March 89
APPD	<i>[Signature]</i>	
RESPONSIBLE ENGINEER		3/89
R.L. MARTELL		
DRAFTING APPD		
CHECKED	<i>[Signature]</i>	3/5/89
DRAWN	K.D. JUNT	3/89
CLASSIFICATION	BY NOT REQ'D	
NONE		

U. S. Department of Energy
Richland Operations Office



OVERALL HANFORD FACILITIES

SCALE AS SHOWN 600 GEN INDEX NO. 0100

DRAWING NO. H-6-958 SHEET NO. 1 SHEETS 1

IN-170550

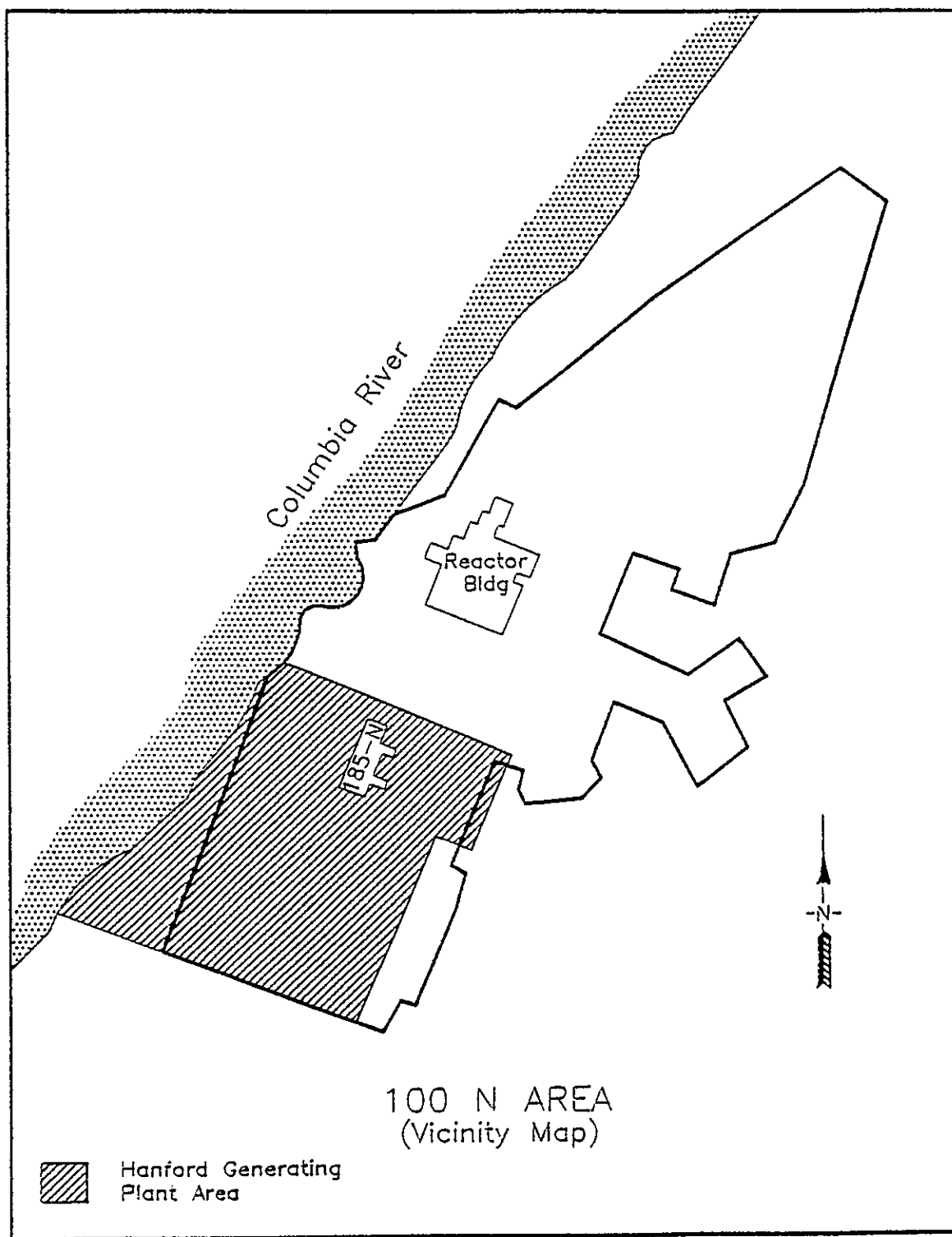
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DESCRIPTION

LAST REV.

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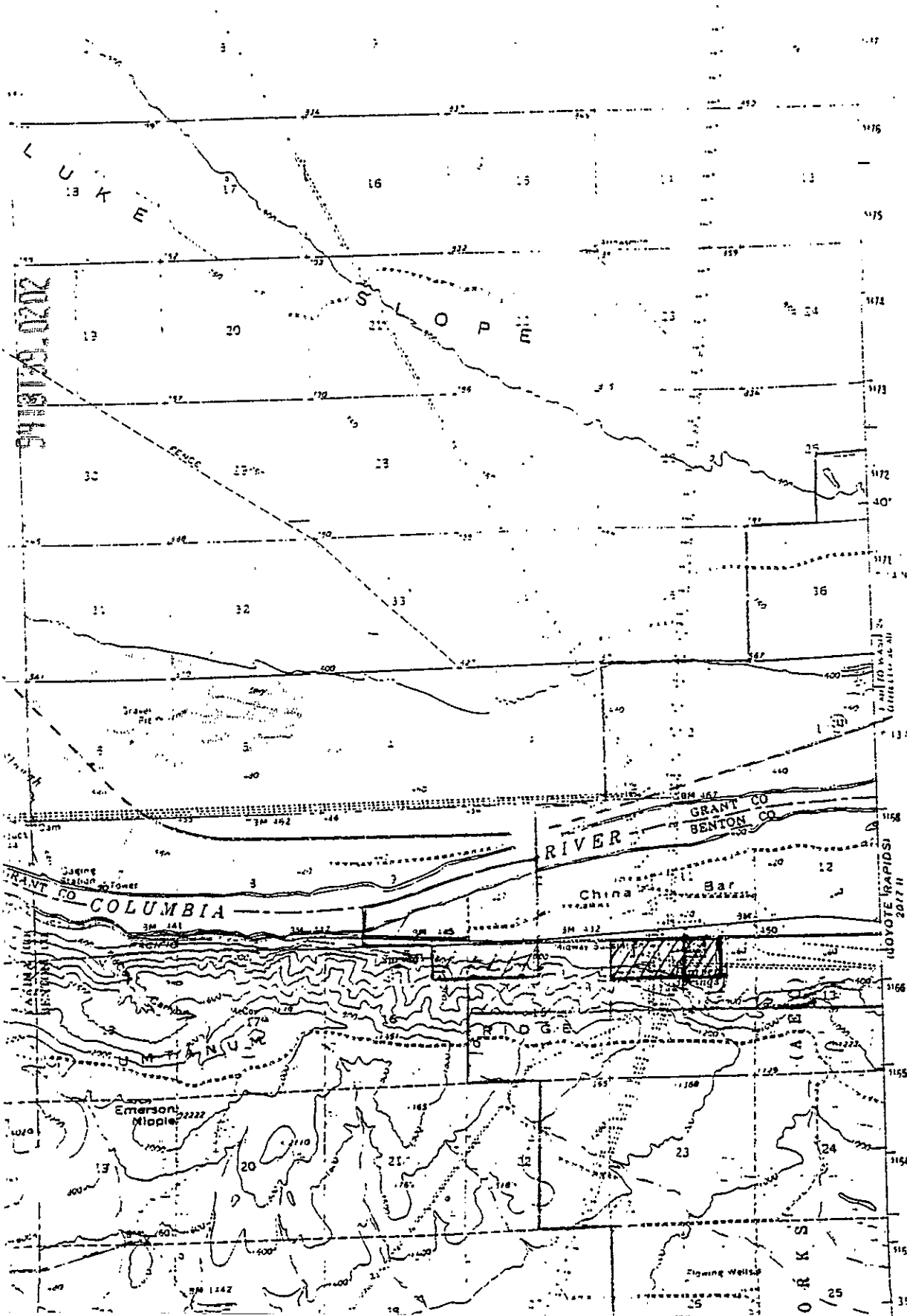
Washington Public Power Supply System
Hanford Generating Plant



GEN\071692-C

9413199-0201

Bonneville Power Administration
Midway Site



BPA Midway
Site